

Exhibit 2

Affidavit Of Standing By Sandra Estell

I, Sandra Estell, declare as follows:

1. I am a resident of East Liverpool, Ohio, where I have lived for my entire life. I am 62 years old.
2. I have lived in my current house at 1410 Etruria Street for 37 years.
3. I am a member of Save Our Counties of Columbiana County, which I joined in 1990.
4. I joined Save Our Counties of Columbiana County because I believe in its mission to protect the environment and public health of East Liverpool, and its commitment to reduce or eliminate the air pollution emitted by the Heritage-WTI hazardous waste incinerator.
5. I have specific, personal health, environmental, and aesthetic interests in the quality of air at my property and in the air surrounding the Heritage-WTI Incinerator. My home is located 800 feet from the hazardous waste incinerator and approximately 75 feet above the incinerator's stack.
6. There are many days when the wind blows in the direction of my home from the incinerator. There are also many days when I experience the wind behave like an umbrella over this area, making the air from the incinerator's stack become trapped in the area surrounding the incinerator and my home.
7. My husband grows a garden on our property. I am concerned about the effect the air pollution coming from the incinerator has on the fruits and vegetables we grow. We have decreased the size of our garden as a result of this concern. The

air pollution from the incinerator causes me to view gardening and eating what we grow as a risk instead of a source of pleasure, which is what it was before the incinerator arrived.

8. The incinerator is a constant source of stress in our lives. Since it began operating, I have felt explosions occur at the incinerator that made me fear that I needed to grab my children and run. Until they replaced their alarm system with an alarm that could not be heard from my home, I would frequently hear alarms during the day and night. This was a constant source of fear and stress in my life.
9. The knowledge that violations of air emissions standards continue to occur remains a constant source of stress. The knowledge that violations and emissions increases may be taking place without the public even having the ability to find out is also a source of stress.
10. It is my understanding that air pollution emissions, including excess levels of nitrous oxides, sulfur dioxide, and particulate matter, can cause damage to human health. I am concerned that my health may have been and may continue to be harmed, adversely affected, and irreparably injured by the air pollution emissions coming from Heritage-WTI's hazardous waste incinerator.
11. I believe the air emissions contribute to my daughter suffering severe allergies when she comes to visit me, and to the development of severe allergies in three of my children.
12. I believe the air emissions from the incinerator have contributed to the discoloration of my neighbors' homes, which have become coated in orange when they used to be white or light in color. This discoloration of homes neighboring

our property negatively impacts the aesthetic quality of my surrounding environment and the view from my home.

13. I believe the air emissions from the incinerator contributed to the economic downturn of my community and to the closing of the nearby school.
14. The relief sought by Plaintiffs will, if granted by the court, help significantly in redressing the injuries to my interests resulting from the alleged violations of federal and state law. It is my understanding and belief that the proper enforcement of the Clean Air Act and the Ohio State Implementation Plan will result in Heritage-WTI being required to adhere to specific air quality standards and reporting requirements established for the protection of human and environmental health.



SANDRA ESTELL

Sworn before me and subscribed in my presence this 17 day of May, 2016.


NOTARY PUBLIC

Marilyn Bosco
State of Ohio
My Commission Expires December 18, 2020